

From: camille@baymoon.com%inter2 [camille@baymoon.com] on behalf of camille@baymoon.com
Sent: Saturday, August 13, 2005 2:24 AM
To: Benham, Katherine
Subject: Comments on Handling Committee Recommendation Relative to "Agricultural" and "Nonagricultural" Substances

Attachments: ATTACHMENT.TXT
To: National Organic Standards Board

As a longtime consumer of certified organic products and as someone employed in the organic industry*, I urge the NOSB to declare yeast an agricultural product. I place a great deal of trust in the organic seal, and that the seal represents good decision making and upholds organic integrity. At it's simplest, most basic level, organic certification is (non-fossilized) organism-based. Since the tools and means of implementing the NOP reside in careful planning, tracking, and documenting practices, it stands to reason that these same principles of cultivation and management can be applied to the production of yeast organisms and yeast products.

There are clear choices for the yeast cultivator. One set of choices (as in non-organic commercial yeast production) bears no resemblance to organic standards, employing instead the use of caustic chemicals, which leaves in it's wake a chemically-laden wastewater. There is a better alternative, which is a currently available commodity: a healthily produced yeast grown on certified organic grains, under controlled conditions, using non-GMO yeast strains and lactic acid, with strictly controlled inputs whose every certifiable raw material meets NOP standards. In the case of the cultivation of yeast organisms, the fermentation tank which houses the yeast acts as the farm.

As a consumer, I trust the NOP to support the application of organic methods whenever possible. I want to know that the best organic alternatives have been chosen for certified products - that for example the yeast in my otherwise organic bread is organic. The substrate on which the yeast is grown does matter, and the methods used to produce organic yeast microorganisms do fit into systems certifiable under the NOP- just as substrates matter in soil-produced products, etc.. To declare yeast as non-agricultural at this time would be walking away from very compelling scientific views urging otherwise, and would surely send a resounding message showing weakening of NOP standards.

That yeasts are unique in their biological role, forms and expressions is undeniable. Yeasts are ubiquitously used as "catalysts" - agents of fermentation - in many types of consumer products that bear organic certification. But aside from yeast's role in fermentation, inactive yeast itself is a highly nutritious food, containing substantial naturally-occurring B-vitamins and amino acids. The

inactive yeasts¹ nutritional profile indicates that it would have to have been grown as part of a living system. Although organic certification covers more than food stuff, food as we know it comes only from agricultural sources. Therefore yeast is agricultural and certifiable as organic.

As a consumer, I expect to see our national standards staying current and true to the defining spirit of organic production. The future of certified organics resides in part in micro-organisms - they have countless beneficial applications to medicines, foods, and other consumer products.

We have yet to see the vital contributions that certified organics will make in these areas. The NOSB has an important role in the stewardship of the NOP and in ensuring that it remains a timely and healthily evolving system. The declaration of yeast as agricultural is the next logical step.

Sincerely,
Camille O. Nava

*My employer is Marroquin International Organic Commodities Services, Inc.